

BURSOR & FISHER, P.A.
Neal Deckant (State Bar No. 322946)
1990 North California Blvd., 9th Floor
Walnut Creek, CA 94596
Telephone: (925) 300-4455
Facsimile: (925) 407-2700
E-mail: ndeckant@bursor.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE META PIXEL TAX FILINGS CASES

Master File No. 5:22-cv-07557-PCP (VKD)

This document relates to:

**DECLARATION OF NEAL J. DECKANT
IN SUPPORT OF MOTION TO SEAL**

All actions

The Honorable P. Casey Pitts
Courtroom 8, 4th Floor

I, Neal J. Deckant declare as follows:

1. I am an attorney at law licensed to practice in the State of California. I am also a member of the bar of this Court and a partner at Bursor & Fisher, P.A., counsel of record for Plaintiffs. I have personal knowledge of the facts set forth in this declaration, and, if called as a witness, could and would competently testify thereto under oath.

2. Defendant produced certain documents containing information that it designated as either Confidential or Highly Confidential – Attorney’s Eyes Only.

3. Some of the aforementioned documents or deposition testimony is being submitted in support of Plaintiffs’ concurrently filed Reply in Support of Class Certification. As to documents designed by Defendant, Plaintiffs submit this request only to comply with their obligations under Local Rule 79-5 and the protective order issued in the case. Plaintiffs take no position at this time on the propriety of Defendant’s confidentiality designations, or whether they meet the compelling reasons test for retaining confidentiality. As to Plaintiffs’ expert reports, the reports cite information throughout designated by Meta as either Confidential or Highly Confidential – Attorney’s Eyes Only by Defendant.

4. Plaintiffs propose that the following materials designated as either Confidential or Highly Confidential – Attorney’s Eyes Only by Meta should be sealed:

Document	Portions of Documents to be Sealed
Plaintiffs’ Reply in Support of Class Certification (“Reply”)	Page 8: lines 5-6 Page 11: lines 2-3, 14-16
Ex. 1 to Deckant Declaration in Support of Reply (<i>Meta Letter</i>)	Entirely Under Seal
Ex. 2 to Deckant Declaration in Support of Reply (<i>30(b)(6) Deposition Transcript</i>)	Page 49: lines 12-20, 25 Page 124: lines 1-5, 8-11, 13, 19-21, 23 Page 125: lines 11, 15-16, 18, 22-25
Ex. 3 to Deckant Declaration in Support of Reply (<i>Wooldridge Deposition Transcript</i>)	Entirely Under Seal
Ex. 4 to Deckant Declaration in Support of Reply (<i>Zeidman Reply Report</i>)	Entirely Under Seal
Plaintiffs’ Opposition to Defendant’s Daubert Motion to	Page 2: lines 13-14 Page 3: lines 5, 11, 13-15

1	Strike or Exclude the Opinions of	
2	Plaintiff's Expert Colin B. Weir	
3	("Opp. to Weir Daubert")	
4	Ex. 1 to Liskow Decl. in Support	Page 112: lines 7-8, 20
5	of Opp. to Weir Daubert (<i>Weir</i>	Page 125: lines 11-15
6	<i>Deposition Transcript</i>)	Page 126: lines 20-21
7	Plaintiffs' Opposition to	Page 2: lines 4-6
8	Defendant's Motion to Exclude	Page 5: lines 3-5, 7-13, 27-28
9	the Expert Report and Testimony	Page 6: lines 3-4, 17-23
10	of Robert Zeidman ("Opp. to	Page 7: lines 4-10, 12-15
11	Zeidman Daubert")	Page 8: lines 18-20
12		Page 9: lines 14-21, 23-28
13		Page 10: lines 1-3, 12-14
14		Page 11: lines 2-6
15		Page 12: lines 6-9, 13-17, 21-26
16		Page 13: lines 9-11, 15-21, 23, 28
17		Page 14: lines 1, 3-4, 21-25
18		Page 15: lines 11-16, 20-24
19		Page 16: lines 23
20		Page 17: lines 2, 12-14
21		Page 18: lines 1
22		Page 19: lines 1-28
23		Page 20: lines 1-5
24		Page 21: lines 10, 18-26
25		Page 22: lines 15-18, 20-28
26		Page 23: lines 1
27	Ex. A to Baxter-Kauf Decl. in	Page 67: lines 21-22
28	Support of Opp. to Zeidman	Page 68: lines 3-9, 13-16, 24-25
	Daubert (<i>Zeidman Deposition</i>	Page 71: lines 24
	<i>Transcript</i>)	Page 72: lines 4, 7
		Page 76: lines 1-4
		Page 77: lines 8-9
		Page 93: lines 5
		Page 146: lines 1-3, 5-6, 8-9, 11-13, 15-19
	Ex. B to Baxter-Kauf Decl. in	Entirely Under Seal
	Support of Opp. to Zeidman	
	Daubert (<i>Zervas Deposition</i>	
	<i>Transcript</i>)	

1 I declare under penalty of perjury under the laws of the United States and the State of
2 California that the foregoing is true and correct. Executed on December 15, 2025.

3 /s/ Neal J. Deckant

4 Neal J. Deckant